

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA**

**STEWART ABRAMSON, individually and on  
behalf of a class of all persons and entities  
similarly situated,**

**Plaintiff,**

**V.**

**AMERICAN ADVISORS GROUP, INC. AND  
COMPLETE BUSINESS MARKETING  
COMPANY, LLC, DBA EXCLUSIVE  
PROSPECT,**

,

**Defendants.**

Case No. 2:19-cv-1341-MJH

COMPLAINT-CLASS ACTION

**MOTION FOR ADMISSION *PRO HAC VICE* OF DANIEL DELNERO**

I, Daniel Delnero, counsel for defendant, AMERICAN ADVISORS GROUP, INC., hereby move for admission to appear and practice in this Court in the above-captioned matter as counsel *pro hac vice* for AMERICAN ADVISORS GROUP, INC., pursuant to LCvR 83.2 and LCvR 83.3.

In support of this motion, I have attached my affidavit filed herewith, which, it is averred, satisfies the requirements of the foregoing Local Rules and Standing Order.

Respectfully submitted,

Dated: March 20, 2020

/s/ Daniel Delnero

Eric Troutman, CA ID No. 229263, *pro hac*  
*vice* pending

Daniel Delnero, GA ID No. 347766, *pro hac*  
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